

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**UNITED STATES OF AMERICA**

\*

**vs.**

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**Case No.: 1:06-CR-00155-CAP**

**JAMES BAILEY, et al.**

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**DEFENDANT, JAMES BAILEY'S MOTION TO SUPPRESS EVIDENCE**

The Defendant, James Bailey, by and through his counsel, Drew Findling, Kenneth W. Ravenell and Schulman, Treem, Kaminkow, Gilden & Ravenell, P.A., pursuant to Rule 12(b)(3) of the Federal Rules of Criminal Procedure, hereby moves to suppress the fruits of any and all searches conducted by the police or other government agents with respect to Mr. Bailey and the events surrounding the above-referenced matter as the products of illegal searches and/or seizures, including, but not limited to, any and all searches of Mr. Bailey's person; any residence(s) owned or possessed by Mr. Bailey; any vehicle(s) or owned or possessed by Mr. Bailey; and any sole or joint bank account(s) owned or possessed by Mr. Bailey.

Specifically, Mr. Bailey asserts that, as to all counts of the Indictment and First Superseding Indictment, all such searches and/or seizures were conducted either without a valid warrant, without probable cause for the issuance of a valid warrant, without reasonable articulable suspicion that the Defendant had committed a crime, and in violation of the Fourth and Fourteenth Amendments to the United States Constitution. Accordingly, any evidence obtained in connection with such searches and/or seizures should be suppressed.

Defendant also moves to suppress any and all statements that he allegedly made to any law enforcement agents in connection with this matter.

Respectfully submitted,

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